

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
v.  
Juan Carlos Alberto GONZALEZ-Martinez

Case No. 5:19-mj-290-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 10, 2019 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*  
18 USC 1544

*Offense Description*  
Whoever willfully and knowingly uses, or attempts to use, any passport issued or designed for the use of another; or whoever willfully and knowingly uses or attempts to use any passport in violation of the conditions or restrictions therein contained, or of the rules prescribed pursuant to the laws regulating the issuance of passports; or whoever willfully and knowingly furnishes, disposes of, or delivers a passport to any person, for use by another than the person for whose use it was originally issued and designed.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

/S/Octavio Morales

*Complainant's signature*

Octavio Morales, Border Patrol Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: March 11, 2019

*Judge's signature*

City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA  
V.**

**CRIMINAL COMPLAINT**

Juan Carlos Alberto GONZALEZ-Martinez

**Case Number:**

1. On March 10, 2019, at approximately 3:10 PM, a Laredo North Border Patrol Agent (BPA) was working checkpoint operations at the Border patrol Checkpoint on I35 mile marker 29.
2. BPA performed immigration inspections on all occupants of a northbound bus.
3. One of the occupants of the bus presented a US passport card as proof of citizenship and verbally stated that he was a US citizen.
4. BPA noticed that the photograph on the passport card was not the subject presenting the card.
5. Upon further questioning the subject admitted to being Juan Carlos GONZALEZ-Martinez, a citizen and national of Mexico with no legal right to be present in the United States. GONZALEZ-Martinez had a Mexican voter ID in his possession which verified his identity.

SUBSCRIBED and SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Signature of Judicial Officer

\_\_\_\_\_  
Signature of Complaint